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May 2, 2025

VIA ELECTRONIC CASE FILING

Hon. Sharon A. King, U.S.M.J.
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
Mitchell H. Cohen United States Courthouse Annex
400 Cooper Street, Courtroom 5C
Camden, New Jersey 08102-1570

Re: *Judith A. Adirzone v. Thomas Jefferson University, et al.*
United States District Court for the District of New Jersey
Case No. 1:24-cv-04086-CPO-SAK

Dear Judge King:

This firm represents plaintiff Judith A. Adirzone (“Plaintiff”) in the above matter. We write with the consent of counsel for Thomas Jefferson University (“TJU”) and the Jefferson Health and Welfare Plan (“Plan”) (collectively “Defendants”) requesting to modify the briefing schedule set forth in the Court’s Text Order (D.E. 30) of April 3, 2025. In *lieu* of each party filing competing dispositive motions on May 19, 2025, the parties have agreed to the following proposed briefing schedule subject to the Court’s approval:

- June 2, 2025: Plaintiff Motion for Summary Judgment to be filed;
- June 23, 2025: Defendants’ Cross-Motion and Opposition to be filed;
- July 14, 2025: Plaintiff’s opposition to cross-motion/reply brief due; and
- July 21, 2025: Defendants’ deadline to file Reply in further support of their cross-motion with consent of Plaintiff and permission of the Court. The reply shall be limited to 15 pages in accordance with the traditional rule. (L. CIV. R. 7.2(b)).

Because this matter concerns a claim for plan benefits under ERISA, and after conferring with counsel for Defendant, the parties have agreed to work collaboratively to ensure that our motions will be based on the administrative record, and counsel will work together to ensure that when Plaintiff files her motion the parties will have agreed the necessary redactions of personal identifiers in the administrative record pursuant to FED. R. CIV. P. 5.2(a) and the Local Rules of this district court.



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Per the Court's Text Order (D.E. 30) and in accordance with District Judge O'Hearn's individual practice rules, a Proposed Order is submitted herewith.

We thank the Court for its time and consideration.

Respectfully submitted,

BUTTACI LEARDI & WERNER LLC

/s/ Christopher B. Bladel

Christopher B. Bladel
An Attorney of the Firm

cc: Michael E. Holzapfel, Esq. (*via ECF only*)